

1 RICHARD JAFFE, ESQ.  
2 State Bar No. 289362  
3 428 J Street, 4<sup>th</sup> Floor  
4 Sacramento, California 95814  
5 Tel: 916-492-6038  
6 Fax: 713-626-9420  
7 [Email: rickjaffeesquire@gmail.com](mailto:rickjaffeesquire@gmail.com)

8 ROBERT F. KENNEDY JR., ESQ.  
9 MARY HOLLAND, ESQ.  
10 (Subject to *pro hac vice* admission)  
11 Children's Health Defense  
12 752 Franklin Ave., Suite 511  
13 Franklin Lakes, NJ 07417  
14 Telephone: (202) 854-1310  
[mary.holland@childrenshealthdefense.org](mailto:mary.holland@childrenshealthdefense.org)

15 Attorneys for Plaintiffs

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

LETTRINH HOANG, D.O., PHYSICIANS  
FOR INFORMED CONSENT, a not-for profit  
organization, and CHILDREN'S HEALTH  
DEFENSE, CALIFORNIA CHAPTER, a  
California Nonprofit Corporation,

Plaintiffs,

v.

ROB BONTA, in his official capacity as  
Attorney General of California and, ERIKA  
CALDERON, in her official capacity as  
Executive Officer of the Osteopathic Medical  
Board of California ("OMBC"),

Defendants.

**Case No: 2:22-cv-02147-DAD-AC**

**DECLARATION OF JAMIE  
COKER-ROBERTSON IN  
SUPPORT PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

Date: January 17, 2023  
Time: 1:30 PM  
Courtroom: 5, 14<sup>th</sup> floor (via Zoom)  
Judge: Hon. Dale A. Drozd

Action Commenced: December 1, 2022

1       1. I, Jamie Coker-Robertson, am the mother of a 14-year-old child (SS). I am  
2 making this declaration from my personal experience. SS has been a patient of Dr. Hoang her  
3 whole life, since birth. SS is healthy and unvaccinated for Covid-19.

4       2. SS has a routine medical appointment with Dr. Hoang in February 2023, where I  
5 know we'll discuss Covid-19 and vaccination because of the pandemic. I will be present  
6 during the appointment, and I have lots of questions for Dr. Hoang, some of which are detailed  
7 because I want to get her honest opinion on scientific developments, such as risk of  
8 myocarditis.

9       3. Dr. Hoang advised us that she is a plaintiff in this case, and that she has a plan to  
10 provide our family with independent advice and treatment from her integrative medicine  
11 perspective, but also she will let us know conventional information from the CDC.

12       4. In preparation for the appointment, Dr. Hoang shared with me two declarations  
13 in support of a motion for preliminary injunction in this case: her own declaration and the  
14 declaration of Sanjay Verma, MD.

15       5. I want to be assured that my daughter's appointment in February (and any future  
16 appointment) is free from undue influence by the osteopathic medical board. As long as  
17 AB2098 is a law in California, I will never be able to trust that my physician patient  
18 relationship is truly sacrosanct. I feel violated by AB2098.

19       6. AB2098 forces me into a predicament regardless of the outcome of our  
20 appointment, meaning that in February either (1) Dr. Hoang will violate AB2098 by providing  
21 me candid information outside "contemporary scientific consensus" exactly like the  
22 preliminary injunction declarations say will happen, or (2) Dr. Hoang will self-censor herself  
23 to my family's detriment.

24       7. But as long as AB2098 is the law, how am I *really* supposed to know there is no  
25 self-censorship? AB2098 is an outrageous intrusion to our doctor-patient relationship.

26       8. I have asked Dr. Hoang to file this declaration in court in the hopes that AB2098  
27 can be enjoined before I'm forced into this predicament at our next doctor appointment.  
28 I declare under penalty of perjury that the above information is true and correct.

1 Signed on December 2, 2022, at Fountain Valley, California.

2   
3 Jamie Coker-Robertson

4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28